

BERGSTEIN & ULLRICH, LLP

- ATTORNEYS AT LAW -

15 RAILROAD AVENUE • CHESTER, NEW YORK 10918

TELEPHONE (845) 469-1277

FACSIMILE (845) 469-5904

E-MAIL: thefirm@tbulaw.com

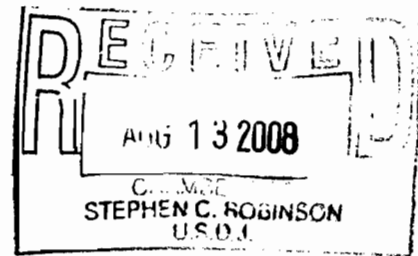
www.tbulaw.com

Stephen Bergstein
Helen G. Ullrich

Of Counsel
Christopher D. Watkins

MEMO ENDORSED August 11, 2008

Hon. Stephen C. Robinson, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601



re: Ramos v. Pillar, Inc.
07 Civ. 4047 (SCR)

Dear Judge Robinson:

This firm represents plaintiff Nicole Ramos in this Title VII gender discrimination case. Fact discovery is presently scheduled to end on August 25, 2008 and I am writing to request a 60-day extension, to October 25, 2008. Counsel for defendant consents to this request.

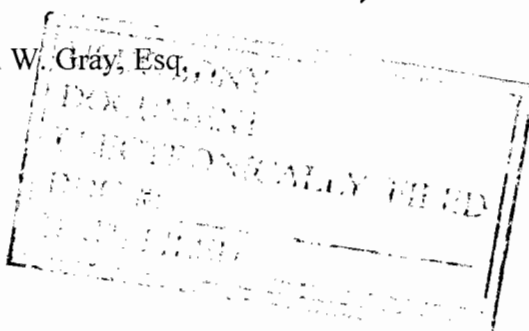
Both parties have been working diligently to complete discovery. However, we have experienced delays in arranging to examine computer files and have been thwarted in scheduling two depositions by vacation plans, including those of the witnesses. In addition, I have a two-week trial scheduled to begin on Sept. 8. Therefore, we believe that an extension to October 25 is reasonable.


Thank you for your consideration in this matter.

Sincerely,


Helen G. Ullrich

cc: Justin W. Gray, Esq.



APPLICATION GRANTED

HON. STEPHEN C. ROBINSON
8/21/08